

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA

) CRIMINAL NO. 1-23-590  
 ) 21 U.S.C. § 846  
 ) 21 U.S.C. § 841(a)(1)  
 ) 21 U.S.C. § 841(b)(1)(B)  
 ) 21 U.S.C. § 841(b)(1)(D)  
 ) 21 U.S.C. § 856(a)(2)  
 ) 18 U.S.C. § 1956  
 ) 18 U.S.C. § 1956(h)  
 ) 18 U.S.C. § 1956(a)(1)(A)(i)  
 ) 18 U.S.C. § 1956(a)(1)(B)(i)  
 ) 18 U.S.C. § 2  
 ) 18 U.S.C. § 1343  
 ) 18 U.S.C. § 981(a)(1)(C)  
 ) 18 U.S.C. § 982(a)(1)  
 ) 18 U.S.C. § 982(b)(1)  
 ) 21 U.S.C. § 853  
 ) 21 U.S.C. § 881  
 ) 28 U.S.C. § 2461(c)

v.

**JOERON BROWN,  
a/k/a "SCRIP",  
EDSEL LOVE,**

**SEALED INDICTMENT**

COUNT 1

## THE GRAND JURY CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning at least in or around January 2020 and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **JOERON BROWN, a/k/a “SCRIP”, and EDSEL LOVE**, knowingly and intentionally did combine, conspire, agree and have tacit understanding with others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and to distribute marijuana, a schedule I controlled substance;

- a. With respect to the Defendant, **JOERON BROWN**, a/k/a “**SCRIP**”, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is 100 kilograms or more of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);
- b. With respect to the Defendant, **EDSEL LOVE**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D);

All in violation of Title 21, United States Code, Section 846.





In violation of Title 21, United States Code, Section 856(a)(2).



COUNT 15

THE GRAND JURY FURTHER CHARGES:

At all times relevant to this Indictment:

1. The Defendant, \_\_\_\_\_, was a citizen of the United States with an address of \_\_\_\_\_

2. \_\_\_\_\_ was associated with \_\_\_\_\_ and is registered in \_\_\_\_\_ The Florida Division of Corporations lists the business as inactive as of September 25, 2020.

3. \_\_\_\_\_ was associated with \_\_\_\_\_ and is registered in \_\_\_\_\_ as the registered agent. Bethany Henderson is listed as the manager.

4. TD Bank is a financial institution, as defined by Title 18, United States Code, Section 20, with deposits insured by the Federal Deposit Insurance Corporation.

**The CARES Act and EIDL**

5. Beginning on or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, as administered through the Small Business Administration (SBA), provided emergency assistance to small business owners, including agricultural businesses and nonprofit organizations in all the United States, Washington D.C., and territories affected by the Coronavirus (COVID-19) pandemic. The sources of funding for small businesses were the Paycheck Protection Program (PPP) and the Economic Injury Disaster Loans program (EIDL).

6. The SBA EIDL program was intended to provide small businesses with working capital for fixed debts, payroll, accounts payable, and other bills resulting from the pandemic. The loan agreements signed to secure EIDL funding state, among other provisions, that the loan





**Manner and Means**

9. It was part of the scheme that, in May 2020,  
applied for a \$150,000 Small Business Administration Loan (EIDL) through TD  
Bank. provided the business contact address as  
and specified that he was the manager for the business with 12 employees.
  10. This application was approved in the amount of \$150,000 with a \$10,000 advance.  
On or about June 18, 2020, a wire ACH credit from the SBA for the EIDL was received into  
TD Bank Account \*0385 for \$10,000.
  11. On or about July 17, 2020, a wire ACH credit from the SBA was received into  
TD Bank Account \*0385 for \$149,900 and \$100 was disbursed to pay for the UCC  
lien filing fee.
  12. On or about October 16, 2020, \$58,000 was electronically transferred from the  
TD Bank Account \*0385 to BRH Holdings TD Bank Account \*8579.
  13. On or about October 16, 2020, \$57,131.47 was withdrawn in the form of a cashier's  
check made payable to Christine Oyer Law Firm LLC as a down payment on a strip mall located  
at 755 John B White Sr Blvd., Spartanburg, South Carolina.
- All in violation of Title 18, United States Code, Section 1343.

## **FORFEITURE**

### **DRUG OFFENSES:**

Upon conviction for felony violation of 21, United States Code as charged in this Indictment, the Defendants, **JOERON BROWN, a/k/a "SCRIP", and EDESEL LOVE**, shall forfeit to the United States all of the Defendants' rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
  - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
  - (2) involved in or used in any knowing violation of 18 U.S.C. § 924, or violation of any other criminal law of the United States or intended to be used in a crime of violence.

### **MONEY LAUNDERING:**

Upon conviction for violation of Title 18, United States Code, Section 1956 as charged in this Indictment, the Defendants, **JOERON BROWN, a/k/a "SCRIP", EDESEL LOVE, AND** shall forfeit to the United States any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, as charged in the Indictment, or any property traceable to the offenses.

WIRE FRAUD:

Upon conviction for violation of Title 18, United States Code, Section 1343 as charged in this Indictment, the Defendant, \_\_\_\_\_ shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as result of such offenses.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1); Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes, but is not limited to the following:

(1) Proceeds/Wire Fraud Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug and wire offenses charged in the Indictment, and all interest and proceeds traceable thereto, for which the Defendants are liable as a result for their violations of 21 U.S.C. §§ 841 and 846 and 18 U.S.C. § 1343.

(2) Money Laundering/Forfeiture Judgment:

A sum of money equal to all property involved in the money laundering offenses charged in the Indictment, and all interest and proceeds traceable thereto, for which the Defendants are liable as the result of their violations of 18 U.S.C. § 1956.

(3) Specified Property:

- a. 28-38 Pond Street, Spartanburg, South Carolina  
Titled to Earl J. Properties
- b. 422 Chamber Lane, Moore, South Carolina  
Titled to BRH Holdings, LLC
- c. 725 Heavenly Days, Inman, South Carolina  
Titled to Porsha Sun-Jaye Means
- d. 755 & 780 John B. White, Sr. Blvd., Spartanburg, South Carolina  
Titled to FTS Global Management, LLC

SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of a Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p) as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the said Defendant up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1); Title 21, United States Code, Sections 853 and 881; and Title 28, United States Code, Section 2461(c).

A true BILL

REDACTED

FOREPERSON

BROOK B. ANDREWS  
ACTING UNITED STATES ATTORNEY

By: Carrie A. Fisher  
Carrie Fisher Sherard (Fed. ID 10134)  
Assistant United States Attorney  
55 Beattie Place, Suite 700  
Greenville, South Carolina 29601  
Tel: 864-282-2100  
Fax: 864-233-3158  
Email: [carrie.a.fisher@usdoj.gov](mailto:carrie.a.fisher@usdoj.gov)